UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

RITLABS, S.R.L.,

Plaintiff,

٧.

Case No.: 1:12-cv-00215 Hon. Anthony J. Trenga

Stefan Vanurcos

RITLABS, INC., et. al.

Defendants.

DECLARATION STEFAN TANURCOV

- I, Stefan Tanurcov, declare and state as follows:
- 1. I am Stefan Tanurcov, a 30% owner of RitLabs, SRL.
- RitLabs SRL was formed under the laws of the Republic of Moldova on February
 16, 1998.
- 3. Mr. Demcenko created RitLabs Inc, a corporation organized under Virginia Law, which is in violation of Moldova Law.
- 4. I learned that Mr Demcenko had taken control fo the <ritlabs.com> domain name and changed the WHOIS entry associated with the domain name from RitLabs, SRL to RitLab, Inc. of Virginia.
- Mr Demcenko did this to divert customers of SRL to INC and when confronted about this he threatened to shut down the <ri>tlabs.com> website.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 12 Jul, 2012

Stefan Tanurcov